REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed on March 3, 2008, and the Examiner Interview held on May 6, 2008. This Reply encompasses a bona fide attempt to overcome the rejections raised by the Examiner and presents amendments as well as reasons why Applicant believes that the claimed invention, as amended, is novel and nonobvious over the applied prior art. Accordingly, Applicant respectfully requests reconsideration and favorable action in this case.

Interview Summary

Pursuant to Applicant Initiated Interview Request submitted on April 28, 2008, and May 1, 2008, a telephonic interview was conducted on May 6, 2008 between Examiner Dung Chau, Primary Examiner Leslie Wong, Attorney Katharina Schuster, and Agent Kevin Gust. During the interview, differences between embodiments as claimed and the cited references were discussed. Applicant appreciates the time and effort taken by the Examiners to review Applicant's present application and discuss the pending claims and the cited prior art.

Claim Status

Claims 1-25 were pending and rejected. Claims 1 and 14 are amended herein. No claims are cancelled or newly added herein. Support for the amendments presented herein can be found in the specification as originally filed. *See e.g.*, Specification, *paras.* 35-42, 47, and 89-90. No new matter is introduced. By this Amendment, claims 1-25 are pending.

Rejections under 35 U.S.C. § 102

Claims 1-25 were finally rejected under 35 U.S.C. § 102(e) as being anticipated by newly cited U.S. Patent Application Publication No. 2007/0192415 ("Pak"). The rejection is respectfully traversed. Independent claim 14 recites limitations similar to those recited in claim 1. Accordingly, traversal to the rejection will be collectively discussed herein with respect to claim 1.

Amended claim 1 recites:

A computer program product for discovering relationships in an arbitrarily complex environment, comprising a computer program stored on a computer readable storage medium, wherein said computer program comprises instructions executable by a processor to:

maintain a first component having associated properties for representing in a data model a first entity in a system being modeled, wherein the first component has fields which contain information relating to the first entity, and wherein the first entity is a logical or physical entity in the arbitrarily complex environment;

maintain a second component having associated properties for representing a second entity in the system, wherein the second component has fields which contain information relating to the second entity, and wherein the second entity is a logical or physical entity in the arbitrarily complex environment;

maintain one or more relationship discovery rules for analyzing relationships between components in the data model;

associate a relationship discovery rule with the first component;

apply the relationship discovery rule to the second component; and

establish, delete, or update a relationship between the first component and the second component according to the relationship discovery rule, wherein the relationship represents an association between the first entity and the second entity in the system.

As submitted during the Examiner Interview on May 6, 2008, embodiments as claimed in the present application are distinguishable over Pak under 35 U.S.C. § 102(e). For example, in embodiments as claimed in claim 1, an entity is a logical or physical entity in an arbitrarily complex environment. Each entity is represented in a data model by an associated component. Each component is associated with a relationship discovery rule. Thus, as recited in claim 1, a first component represents, in a data model, a first entity in a system that is being modeled. The first component is associated with a relationship discovery rule that corresponds to its representation of the first entity. This relationship discovery rule is then applied to a second component, which represents a second entity in the system that is being modeled, and the relationship between the first and second components is then established, deleted, or updated according to the relationship discovery rule. The resulting relationship between the first and second components in the data model can accurately represent an association between the first and second entities in the system that is being modeled.

By contrast, Pak discloses an extensible interface for inter-module communication. A data model is used in supporting the interface. *See* Pak, page 23,

para. 426. The cited paragraphs 426-429 of Pak appear to describe some functions within a client/server system 100.

In view of the foregoing, Applicant respectfully submits that claim 1 and dependent claims 2-13 recite subject matter not anticipated by Pak under 35 U.S.C. § 102(e) and therefore should be allowed. Claims 14-25 are submitted to be patentable over Pak under 35 U.S.C. § 102(e) for similar reasons as set forth above. Accordingly, withdrawal of this rejection is requested.

CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include any acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 1-25. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

Sprinkle IP Law Group
Attorneys for Applicant

Katharina Wang Schuster
Reg. No. 50,000

Date: *May 28, 2008*
1301 W. 25th Street, Suite 408
Austin, TX 78705
Tel. (512) 637-9220
Fax. (512) 371-9088